

**STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
BUREAU OF REGULATORY SERVICES**

In re: Richard J. Grayson, D.P.M.

Petition No. 2003-0715-019-005

STATEMENT OF CHARGES

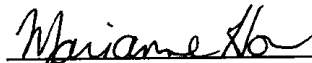
Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Richard J. Grayson:

1. Richard J. Grayson of Avon (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut podiatric license number 000313.
1. Mr. R. (the petitioner) was a patient of respondent.
2. Mr. S. was also a patient of respondent.
3. The medical histories of Mr. R. and Mr. S. differ.
4. On or about July 20, 2002, Mr. S. sought treatment by respondent.
5. On or about July 20, 2002, respondent examined and treated Mr. S., while under the assumption that Mr. S. was Mr. R.
6. Respondent documented said treatment of Mr. S. in Mr. R.'s medical records
7. Respondent billed for payment for treatment of Mr. R for July 20, 2002.
8. Mr. R. was not treated by respondent on July 20, 2002.
9. Respondent failed to document, timely, his July 20, 2002 treatment of Mr. S. in the medical records he maintained for Mr. S.
10. Respondent failed to maintain medical records, timely, for his treatment of Mr. S., in violation of Section 19a-14-40 of the Connecticut Public Health Code.
11. Respondent failed to have an adequate mechanism in place to ensure that each patient's identity could accurately be determined prior to the patient's examination and/or treatment.
12. The above described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-59.

THEREFORE, the Department prays that:

The Connecticut Board of Examiners in Podiatry, as authorized in §§19a-17 and 20-59, revoke or order other disciplinary action against the podiatric license of Richard J. Grayson as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 9th day of December, 2004.


Marianne Horn, Director
Division of Health Systems Regulation
Bureau of Healthcare Systems